

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO**

In re:

**KELLY MICHAEL LYNN AND TINA MARIE LYNN,
Debtors.**

No. 19-12061-TA13

**NOTICE TO TAKE RULE 7030 FRBP
DEPOSITION OF WINDERMERE HIMLIE BY BROKER JEFF CONKLIN**

TO: Joel Alan Gaffney, Esq.
c/o Gaffney Law, PC
Attorney for Kelly and Tina Lynn
6565 America's Parkway, Ste 200
Albuquerque, NM 87110
joel@gaffneylaw.com

You are hereby notified that pursuant to Rule 7030 FRBP adopting Rule 30 F.R.Civ.P. the stenographic deposition will be taken by oral examination of Jeff Conklin as the designated representative of Windermere Himlie, to testify on its behalf, regarding property in the matter of a Washington Real Estate Contract.

The deposition is to be held on **February 27, 2020 at 10:00 a.m.** at the offices of **Whitehouse & Nichols, LLC, 601 West Railroad Avenue #300, Shelton, Washington 98584 (360) 426-5885** until completed, before a court reporter and notary public.

Pursuant to Rule 7030 FRBP, notice is hereby given that the transcript and all exhibits to this deposition may be introduced into evidence and used at the trial of this matter in accordance with Rule 7032 FRBP and Rule 32 F.R.Civ.P.

Respectfully submitted,

ROBERT D. GORMAN, P.A.

Louis Puccini, Jr.

Attorneys for Brian Swanson/Stacy Walker

Post Office Box 25164

Albuquerque, NM 87125-0164

T. 505.243.5442 / F. 505.247.1539

E. louis@rdgormanlaw.com

and

Kenneth C. Weil

WSBA No. 14203

weilkc@weilkc.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above pleading was filed electronically on February 14, 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicates on the electronic filing receipt. Parties may access this filing through the Court's system. I additionally certify that on February 14, 2020 that I emailed a copy of the foregoing to the following:

Joel Gaffney, Esq.
Joel@gaffneylaw.com

Chapter 13 Standing Trustee
Tiffany M. Cornejo, Trustee
orders@ch13nm.com

ROBERT D. GORMAN, P.A.

By: Louis Puccini, Jr.
Louis Puccini, Jr.